

July 12, 2019

Osstem Implant Co., Ltd. % Peter Lee QA/RA Manager Hiossen Inc. 85 Ben Fairless Dr. Fairless Hills, Pennsylvania 19030

Re: K182091

Trade/Device Name: Osstem Abutment System

Regulation Number: 21 CFR 872.3630

Regulation Name: Endosseous Dental Implant Abutment

Regulatory Class: Class II Product Code: NHA Dated: June 12, 2019 Received: June 13, 2019

### Dear Peter Lee:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. Although this letter refers to your product as a device, please be aware that some cleared products may instead be combination products. The 510(k) Premarket Notification Database located at <a href="https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfpmn/pmn.cfm">https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfpmn/pmn.cfm</a> identifies combination product submissions. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration. Please note: CDRH does not evaluate information related to contract liability warranties. We remind you, however, that device labeling must be truthful and not misleading.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the <u>Federal Register</u>.

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Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803) for devices or postmarketing safety reporting (21 CFR 4, Subpart B) for combination products (see <a href="https://www.fda.gov/combination-products/guidance-regulatory-information/postmarketing-safety-reporting-combination-products">https://www.fda.gov/combination-products/guidance-regulatory-information/postmarketing-safety-reporting-combination-products</a>); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820) for devices or current good manufacturing practices (21 CFR 4, Subpart A) for combination products; and, if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to <a href="https://www.fda.gov/medical-devices/medical-device-safety/medical-device-reporting-mdr-how-report-medical-device-problems">https://www.fda.gov/medical-device-problems</a>.

For comprehensive regulatory information about medical devices and radiation-emitting products, including information about labeling regulations, please see Device Advice (<a href="https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance">https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance</a>) and CDRH Learn (<a href="https://www.fda.gov/training-and-continuing-education/cdrh-learn">https://www.fda.gov/training-and-continuing-education/cdrh-learn</a>). Additionally, you may contact the Division of Industry and Consumer Education (DICE) to ask a question about a specific regulatory topic. See the DICE website (<a href="https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice">https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice">https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice</a>) for more information or contact DICE by email (DICE@fda.hhs.gov) or phone (1-800-638-2041 or 301-796-7100).

Sincerely,

for Srinivas Nandkumar, Ph.D.
Acting Assistant Director
DHT1B: Division of Dental Devices
OHT1: Office of Ophthalmic, Anesthesia,
Respiratory, ENT and Dental Devices
Office of Product Evaluation and Quality
Center for Devices and Radiological Health

Enclosure



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510(k) Number: K182091

**Device Name:** Osstem Abutment System

### **Indication for Use:**

Osstem Abutment System is intended for use with a dental implant to provide support for prosthetic restorations such as crowns, bridges, or overdentures.

### • Link Abutment for CEREC

The Link Abutment for CEREC is titanium alloy abutments placed onto OSSTEM dental implants to provide support for customized prosthetic restorations. Link Abutment for CEREC is indicated for screw-retained single tooth or cement-retained single tooth and bridge restorations. All digitally designed copings and/or crowns for use with the Link abutment for CEREC is to be scanned using Sirona CEREC AC or CEREC AF or CEREC AI, designed using Sirona inLab software (Version 3.65) or Sirona CEREC Software (Version 4.2) and manufactured using a Sirona CEREC or inLab MC X or MC XL milling unit. CAD/CAM manufacturing/milling occurs at dental laboratories per the design limitations of the Sirona CEREC.

| X Prescription Use (21 CFR 801 Subpart D) | Over-The Counter Use (21 CFR 801 Subpart C) |
|---|---|
| (PLEASE DO NOT WRITE BELOW THIS LINI      | E – CONTINUE ON ANOTHER PAGE IF NEEDED)     |
| Concurrence of CDRH, Of                   | fice of Device Evaluation (ODE)             |

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## 510(k) Summary

## K182091

Date: July 12, 2019

### 1. Administrative Information

Submitter OSSTEM IMPLANT Co., Ltd.

- Address 66-16, Bansong-ro 513beon-gil, Haeundae-gu, Busan, 612-070, Korea

- Contact Ms. Jungmin Yoo - Phone +82-51-850-2575

Correspondent HIOSSEN Inc.

- Address 85 Ben Fairless Dr. Fairless Hills, PA 19030

- Contact Mr. Peter Lee
- Phone 267-759-7031

### 2. Device Name and Classification

Trade or (Propreitary) Name Osstem Abutment System

Common or Usual Name Dental Abutment

Classification Name Endosseous dental implant abutment

Regulation Number 21 CFR 872.3630

Device Classification Class II
Product Code NHA

### 3. Predicate Device

**Primary Predicate** 

K161689 OSSTEM Implant System - Abutment, Osstem Implant Co., Ltd.

Reference Predicates

K160670 ET US SS Prosthetic System

K160519 Link Abutment for CEREC, Osstem Implant Co., Ltd.

K150295 LOCATOR RTx, Zest Anchors, Inc.

K140507 Hiossen Prosthetic System, Osstem Implant Co., Ltd.
 K132067 Multi Angled Abutment System, Osstem Implant Co., Ltd.

K120847 ET/SS Implant System, Osstem Implant Co., Ltd.K080594 MS System (Narrow Ridge), Osstem Implant Co., Ltd.

K063861 GS System, Osstem Implant Co., Ltd. K062030 US System, Osstem Implant Co., Ltd.

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### 4. Indication for Use

Osstem Abutment System is intended for use with a dental implant to provide support for prosthetic restorations such as crowns, bridges, or overdentures.

### • Link Abutment for CEREC

The Link Abutment for CEREC is titanium alloy abutments placed onto OSSTEM dental implants to provide support for customized prosthetic restorations. Link Abutment for CEREC is indicated for screw-retained single tooth or cement-retained single tooth and bridge restorations. All digitally designed copings and/or crowns for use with the Link abutment for CEREC is to be scanned using Sirona CEREC AC or CEREC AF or CEREC AI, designed using Sirona inLab software (Version 3.65) or Sirona CEREC Software (Version 4.2) and manufactured using a Sirona CEREC or inLab MC X or MC XL milling unit. CAD/CAM manufacturing/milling occurs at dental laboratories per the design limitations of the Sirona CEREC.

## 5. Device Description

Osstem Abutment System is compatible with the following implant systems.

| Manufacturer             | Model Name    | Connection    | Diameter (mm)  |
|--------------------------|---------------|---------------|--|
| Osstem Implant Co., Ltd. | TS SA Fixture | Internal Hex  | 3.2, 3.5, 3.75, 3.77, 4.2, 4.25, 4.4, 4.6, 4.63, 4.65, 4.8, 4.9, 5.05, 5.08, 5.1, 5.25, 5.92, 5.95, 6, 6.2, 6.8, 7.1 |
|                          | SS SA Fixture | Internal Octa | 3.75, 4.1, 4.25, 4.45, 4.6, 4.9, 5, 5.05, 5.92, 5.95, 5.96, 6, 6.8, 6.93   |
|                          | US SA Fixture | External Hex  | 3.6, 4.2, 5.1, 5.2   |
|                          | MS SA Implant | Narrow Ridge  | 2.5, 2.9   |

Osstem Abutment System is intended for use with a dental implant to provide support for prosthetic restorations such as crowns, bridges, or overdentures.

Osstem Abutment System is similar to other commercially available products based on the intended use, technology used, claims, material composition employed and performance characteristics.

Osstem Abutment System is substantially equivalent in design, function and intended use to the predicate devices as above.

| Device            | Content     |  |
|-------------------|-------------|--|
| Transfer Abutment | Description | Transfer Abutment is used for prosthetic restoration. It |



|                            |                  | is used for making general cement-type prosthesis.  |
|----------------------------|------------------|---|
|                            | Material         | Titanium Alloy (Ti-6Al-4V, ASTM F136)   |
|                            | Diameter (mm)    | 4.0, 4.6, 5.0, 6.0, 7.0   |
|                            | Post Height (mm) | 4.0, 5.5, 7.0   |
|                            | Description      | Angled Abutment is used for prosthetic restoration. It is used for making general cement-type prosthesis. It is used when a prosthetic's path adjustment is necessary   |
| Angled Abutment            | Material         | Titanium Alloy (Ti-6Al-4V, ASTM F136)   |
| 1 8                        | Diameter (mm)    | 4.0, 4.5, 5.0, 6.0  |
|                            | Post Height (mm) | 8   |
|                            | Angulation       | 17°   |
| Link Abutment for Cerec    | Description      | Link Abutment for Cerec is used for customized prosthetic restoration. It is indicated for screw-retained single tooth or cement-retained single tooth and bridges restorations. It is compatible with the Sirona CEREC MC X and MC XL prosthetic milling system.                 |
|                            | Material         | Titanium Alloy (Ti-6Al-4V, ASTM F136)   |
|                            | Diameter (mm)    | 4.5   |
|                            | Post Height (mm) | 4.7   |
|                            | Description      | Temporary Abutment is used for prosthetic restoration. It is used temporarily to maintain esthetic appearance until final prosthesis is made.   |
| Temporary Abutment         | Material         | Titanium Gr.3 (ASTM F67)  |
|                            | Diameter (mm)    | 4.0, 4.5  |
|                            | G/H (mm)         | 1.0, 3.0  |
|                            | Description      | If a few numbers of fixtures were implanted in mandibular bone for making full denture, some of fixture path should be leaned. Multi Angled Abutment is used to adjust path of prosthesis.  |
| Multi Angled Abutment      | Material         | Titanium Alloy (Ti-6Al-4V, ASTM F136)   |
|                            | Diameter (mm)    | 4.9   |
|                            | Height (mm)      | 5, 5.1, 5.5, 5.6, 6, 6.1, 6.5, 6.6, 7.5, 7.6  |
|                            | Angulation       | 17°, 30°  |
| Multi NP-Cast Cylinder     | Description      | Multi NP-Cast Cylinder is used for prosthetic restoration. It is used for making screw-retained type prosthesis by casting with non-precious metal alloy; and used with Multi Abutment together. It creates framework of the final prosthesis to be fixed on top of the abutment. |
|                            | Material         | Co-Cr-Mo Alloy (Cylinder Body) + POM (Cylinder Sleeve)  |
|                            | Diameter (mm)    | 5.0   |
|                            | Length (mm)      | 7.3   |
| Multi Combination Cylinder | Description      | Multi Combination Cylinder is used for prosthetic restoration. It is used for making combination-retained type prosthesis with using Multi Abutment together. It creates framework of the final prosthesis to be fixed on   |



|                              |                  | tope of the abutment.  |
|------------------------------|------------------|--|
|                              | Material         | Titanium Gr. 3 (ASTM F67)  |
|                              | Diameter (mm)    | 5.0  |
|                              | Length (mm)      | 7.3  |
| Convertible Angled Cylinder  | Description      | Convertible Angled Cylinder is used for prosthetic restoration. It is used for making combination-retaiend type prosthesis by using with Convertible Abutment together. It is used when path adjustment is necessary at 17° axial angle. |
| Convertible Aligied Cylinder | Material         | Titanium Gr. 3 (ASTM F67)  |
|                              | Diameter (mm)    | 4.2, 5.0, 6.3  |
|                              | Length (mm)      | 7.8  |
|                              | Angulation       | 17°  |
|                              | Description      | Stud Abutment is used for prosthetic restoration. It is used for making stud type overdenture prosthetics.   |
| Stud Abutment                | Material         | Titanium Alloy (Ti-6Al-4V, ASTM F136)  |
|                              | Diameter (mm)    | 3.5  |
|                              | Head length (mm) | 2.5  |
| O-ring                       | Description      | O-ring is inserted into retainer or retainer cap and serves as a buffer for abutments/implants and denture fixation.   |
|                              | Material         | NBR (Acrylonitrile & Butadiene Polymer)  |
|                              | Diameter (mm)    | 3.5  |
|                              | Description      | O-ring Retainer Cap is used for making stud-type overdenture. It is inserted and fixed into denture; and is connected with abutment/implants.  |
| O-ring Retainer Cap          | Material         | Titanium Gr. 3 (ASTM F67)  |
|                              | Diameter (mm)    | 3.95   |
|                              | Height (mm)      | 2.9  |
|                              | Description      | Port Abutment is used for prosthetic restoration. It is for implant retained overdenture at maxilla/mandible in case of the patient has no teeth.  |
| Port Abutment                | Material         | Titanium Alloy (Ti-6Al-4V, ASTM F136)  |
|                              | Diameter (mm)    | 3.5, 3.7, 4.1, 4.8, 5.1  |
|                              | G/H (mm)         | 1, 2, 3, 4, 5, 6, 7  |
|                              | Description      | Port Angled Abutment is used for prosthetic restoration. It is for implant retained overdenture needed of path compensation at maxilla/mandible in case of the patient has no teeth.   |
| Port Angled Abutment         | Material         | Titanium Alloy (Ti-6Al-4V, ASTM F136)  |
|                              | Diameter (mm)    | 4.63, 4.66, 4.68, 4.72, 4.73, 4.74, 4.77, 4.82   |
|                              | Height (mm)      | 6.5, 6.8, 7.5, 7.6   |
|                              | Angulation       | 10°, 17°, 30°  |
| Port Angled Abutment Head    | Description      | Port Angled Abutment Head is used for prosthetic restoration. It is a part that is used to connect with Port Angled Abutment.  |



|                                 | Material          | Titanium Alloy (Ti-6Al-4V, ASTM F136)  |
|---------------------------------|-------------------|--|
|                                 | Diameter (mm)     | 4.6  |
|                                 | Height (mm)       | 3.7  |
| Port Male, Port Extended Male   | Description       | Port Male and Port Extended Male is used for prosthetic restoration. It is used to be inserted between Port Abutment/Port Angled Abutment and Port Male Cap and takes a role to maintain retention of overdenture.   |
|                                 | Material          | Nylon  |
|                                 | Diameter (mm)     | 4.75   |
|                                 | Height (mm)       | 1.8  |
|                                 | Description       | Port Male Cap is used for prosthetic restoration. It is used to fix Port Male or Port Extended Male by inserted into the denture.  |
| Port Male Cap                   | Material          | Titanium Alloy (Ti-6Al-4V, ASTM F136)  |
|                                 | Diameter (mm)     | 5.5  |
|                                 | Height (mm)       | 2.25   |
| Port Male Kit                   | Description       | Port Male Kit is used for prosthetic restoration by providing accessories that are used with Port Abutment or Port Angled Abutment, and it is included of Port Male Cap, Port Provisional Male, Port Spacer, and 3 different types of Port Male as a set.  |
|                                 | Set Configuration | Port Male Cap + Port Provisional Male + Port Spacer + Port Male (3ea)  |
|                                 | Description       | Abutment Screw is used to connect an abutment to the fixture.  |
| Abutment Screw                  | Material          | Titanium Alloy (Ti-6Al-4V, ASTM F136)  |
|                                 | Diameter (mm)     | 2, 2.05  |
|                                 | Length (mm)       | 7.5, 9.6   |
|                                 | Description       | Cylinder Screw is used to connect a cylinder to the abutment.  |
| Cylinder Screw                  | Material          | Titanium Alloy (Ti-6Al-4V, ASTM F136)  |
| -                               | Diameter (mm)     | 2.2, 2.5   |
|                                 | Length (mm)       | 4.35, 4.9  |
| Esthetic-low Temporary Cylinder | Description       | Esthetic-low Temporary Cylinder is used for prosthetic restoration. It is used for making temporary prosthesis before loading final prosthesis. It is used by connected with Multi Abutment, US Multi Angled Abutment or Esthetic-low Abutment to make overdenture and bridge as multiple cases. |
|                                 | Material          | Titanium Gr. 3 (ASTM F67)  |
|                                 | Diameter (mm)     | 4.8, 5.5   |
|                                 | Length (mm)       | 12   |
| Temporary Cap (Narrow Ridge)    | Description       | Temporary Cap is used for prosthetic restoration temporarily. It is a component used to protect upper structure while final prosthesis is made.  |
|                                 | Material          | PC (Poly Carbonate)  |



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| Diameter (mm) | 4   |
|---------------|-----|
| Length (mm)   | 9.6 |

## 6. Substantial Equivalence Discussion

These subject devices are cleared in past 510(k) submissions but submitted to change their identifiers without modifications of dimensions or shape.

Link Abutment for Cerec, K160519 Multi Angled Abutment, K132067 Abutment Screw, K132067

The Indications for Use Statements are compared in the tables below. It can be seen that the Indications for Use Statements of the Subject and Primary Predicate devices are identical, with the exception of the addition to the Subject Indications for Use Statements language regarding the Link Abutment for CEREC. This language is identical to the Indications for Use Statement of the Reference Device being used for the Substantial Equivalence comparison for the Link Abutment for CEREC. All other reference devices have minor changes in wording, but nothing that affects the intended use or safety and effectiveness of the subject device system.

|                                  | Osstem Abutment System  | OSSTEM Implant System -<br>Abutment   | Link Abutment for CEREC  |
|----------------------------------|---|---|--|
| 510(k) No.                       | Proposed  | Predicated (K161689)  | Referenced (K160519)   |
| Manufacturer                     | Osstem Implant Co., Ltd.  | Osstem Implant Co., Ltd.  | Osstem Implant Co., Ltd.   |
| Indications for<br>Use Statement | Osstem Abutment System is intended for use with a dental implant to provide support for prosthetic restorations such as crowns, bridges, or overdentures.  • Link Abutment for CEREC The Link Abutment for CEREC is titanium alloy abutments placed onto OSSTEM dental implants to provide support for customized prosthetic restorations. Link Abutment for CEREC is indicated for screw-retained single tooth or cement-retained single tooth and bridge restorations. All digitally designed copings and/or crowns for use with the Link abutment for CEREC is to be scanned | The OSSTEM Implant System - Abutment is intended for use with a dental implant to provide support for prosthetic restorations such as crowns, bridges, or overdentures. | The Link Abutment for CEREC is titanium alloy abutments placed onto HIOSSEN dental implants to provide support for customized prosthetic restorations. Link Abutment for CEREC is indicated for screw-retained single tooth or cement-retained single tooth and bridge restorations. All digitally designed copings and/or crowns for use with the Link abutment for CEREC is to be scanned using Sirona CEREC AC or CEREC AF or CEREC AI, designed using Sirona inLab software (Version 3.65) or Sirona CEREC Software (Version 4.2) and manufactured using a Sirona CEREC or inLab MC X or |



| using Sirona CEREC AC or CEREC AF or CEREC AI, designed using Sirona inLab software (Version 3.65) or Sirona CEREC Software (Version 4.2) and manufactured using a Sirona CEREC or inLab MC X or MC XL milling unit. CAD/CAM manufacturing/milling occurs at dental laboratories per the design limitations of the Sirona CEREC. |  | MC XL milling unit. CAD/CAM manufacturing/milling occurs at dental laboratories per the design limitations of the Sirona CEREC. |
|--|--|---|
|--|--|---|

Except for them, the subject devices are substantially equivalent in indications and design principles to the predicate devices as shown below.

|                                  | Transfer Abutment   | Transfer Abutment   | Remark    |
|----------------------------------|---|---|-----------|
| 510(k) No.                       | Proposed  | Predicated (K161689)  | -         |
| Manufacturer                     | Osstem Implant Co., Ltd.  | Osstem Implant Co., Ltd.  | Identical |
| Design                           |   |   | Identical |
| Indications for Use<br>Statement | The Osstem Abutment System is intended for use with a dental implant to provide support for prosthetic restorations such as crowns, bridges, or overdentures. | The OSSTEM Implant System - Abutment is intended for use with a dental implant to provide support for prosthetic restorations such as crowns, bridges, or overdentures. | Identical |
| Principle of Operation           | Using making for general cement-type prosthesis.  | Using making for general cement-type prosthesis.  | Identical |
| Material                         | Titanium Alloy<br>(Ti-6Al-4V, ASTM F136)  | Titanium Alloy<br>(Ti-6Al-4V, ASTM F136)  | Identical |



|   | D(Ø)   | G/H                    | Post         | D(Ø) | G/H  | Post         | Addition of 014   |
|---|--|------------------------|--------------|------|--|--------------|---|
|   | 4  | 1, 2, 3, 4,<br>5, 6, 7 | 5.5, 7       | -    | G/11   | 1 OSt        | Addition of Ø4<br>( <u>New, smallest</u><br><u>diameter</u> ) |
|   | 4.6  | 6, 7                   | 5.5, 7       | 4.6  | 1, 2, 3, 4, 5                                | 5.5, 7       | Addition of Ø4.6<br>(G/H 6, 7mm)                              |
| Dimension (mm)  | 5  | 6, 7                   | 4, 5.5,<br>7 | 5    | 1, 2, 3, 4, 5                                | 4, 5.5,<br>7 | Addition of Ø5<br>(G/H 6, 7mm)                                |
|   | 6  | 6, 7                   | 4, 5.5,<br>7 | 6    | 1, 2, 3, 4,<br>5                             | 4, 5.5,<br>7 | Addition of Ø6<br>(G/H 6, 7mm)                                |
|   | 7  | 1, 2, 3, 4,<br>5, 6, 7 | 4            | -    | 1  | •            | Addition of Ø7<br>(Post 4mm)                                  |
|   | 7  | 6, 7                   | 5.5          | 7    | 1, 2, 3, 4, 5                                | 5.5          | Addition of Ø7<br>(G/H 6, 7mm)                                |
|   |  |                        |              |      | •  | •            |   |
|   | Similarities   |                        |              |      |  |              |   |
|   | Proposed Transfer Abutment has same design, function and indications for use statement; and is made with same material with same manufacturing method by same manufacturer and is generally used for cement-retained restoration compared to that of the predicated Transfer Abutment (K161689). |                        |              |      |  |              |   |
|   | Differe  | nces                   |              |      |  |              |   |
| S.E.  The proposed Transfer Abutment has diameter of 4.0 to 7.0mm that has so diameter among the proposed and the predicated Transfer Abutment (K16 However, the proposed abutment is straight type; therefore, we do not con additional fatigue testing.  Except for its size of diameter, proposed Transfer Abutment and the proposed Transfer Abutment have common in design, function, indication for use, in manufacturing process, manufacturer, etc.; therefore, the proposed Transfer substantially equivalent to the predicated Transfer Abutment (K161689). |  |                        |              |      | ent (K161689).                               |              |   |
|   |  |                        |              |      | for use, material,<br>d Transfer Abutment is |              |   |

|                                  | Angled Abutment                                       | Angled Abutment  | Remark                                       |
|----------------------------------|---|--|--|
| 510(k) No.                       | Proposed  | Predicated (K120847)                                   | -  |
| Manufacturer                     | Osstem Implant Co., Ltd.                              | Osstem Implant Co., Ltd.                               | Identical                                    |
| Design                           | TIN Coating   | TiN Coating  | Identical except for its TiN coating section |
| Indications for Use<br>Statement | The Osstem Abutment System is intended for use with a | The abutment is intended for use with a dental implant | Identical                                    |



|                           | dental implant to provide<br>support for prosthetic<br>restorations such as crowns,<br>bridges, or overdentures.  | fixture to provide support for prosthetic restorations such as crowns, bridges, or overdenture.         |           |  |
|---------------------------|---|---|-----------|--|
| Principle of<br>Operation | Using making general cement-<br>type prosthesis when a<br>prosthetic's path adjustment is<br>necessary.   | Using making general cement-<br>type prosthesis when a<br>prosthetic's path adjustment is<br>necessary. | Identical |  |
| Material                  | Titanium Alloy<br>(Ti-6Al-4V, ASTM F136)  | Titanium Alloy<br>(Ti-6Al-4V, ASTM F136)  | Identical |  |
| Diameter (mm)             | 4.0, 4.5, 5.0, 6.0  | 4.3, 4.5, 5.0, 5.5, 6.0   |           |  |
| Post Height (mm)          | 8   | 8   | Identical |  |
| Angulation                | 17°   | 17°   | Identical |  |
| S.E.                      | Similarities  Proposed Angled Abutment has same design, function and indications for use statement; and is made with same material with same manufacturing method by same manufacturer and is generally used for cement-retained restoration compared to that of the predicated Angled Abutment (K120847).  Differences  TiN coating section between the proposed and predicated Angled Abutment is different. The proposed Angled Abutment has diameter of 4.0 to 6.0mm that has smallest diameter among the proposed and the predicated Angled Abutment (K120847). Therefore, we do consider the additional fatigue testing.  ∴ While TiN coating section is changed and the devices that has different size of diameter are added, proposed Angled Abutment and the predicated Angled Abutment have common in design, function, indications for use, material, manufacturing process, manufacturer, etc.; therefore, the proposed Angled Abutment is substantially equivalent to the predicated Angled Abutment (K120847). |   |           |  |

|              | Temporary Abutment       | Temporary Abutment       | Remark    |
|--------------|--------------------------|--------------------------|-----------|
| 510(k) No.   | Proposed                 | Predicated (K161689)     | -         |
| Manufacturer | Osstem Implant Co., Ltd. | Osstem Implant Co., Ltd. | Identical |

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| Design                           |  |   |           |
|----------------------------------|--|---|-----------|
| Indications for Use<br>Statement | The Osstem Abutment System is intended for use with a dental implant to provide support for prosthetic restorations such as crowns, bridges, or overdentures.  | The OSSTEM Implant System - Abutment is intended for use with a dental implant to provide support for prosthetic restorations such as crowns, bridges, or overdentures. | Identical |
| Principle of<br>Operation        | Cement/screw retained restoration; using making temporary prosthesis to maintain aesthetic appearance until final prosthesis is made.  | Cement/screw retained restoration; using making temporary prosthesis to maintain aesthetic appearance until final prosthesis is made.                                   | Identical |
| Material                         | Titanium Gr. 3<br>(ASTM F67)   | Titanium Gr. 3<br>(ASTM F67)  | Identical |
| Diameter (mm)                    | 4.0, 4.5   | 4.0, 4.5  | Identical |
| Post Height (mm)                 | 10   | 10  | Identical |
| S.E.                             | Similarities  Proposed Temporary Abutment has same design (except for its shape of post), function and indications for use statement; and is made with same material with same manufacturing method by same manufacturer and is used for cement/screw-retained restoration compared to that of the predicated Temporary Abutment (K161689).  Differences  Shape of the post between the proposed and predicated Temporary Abutment is different. Since proposed device is used temporarily, we do not consider additional fatigue testing.  ∴ While shape of the post of Temporary Abutment is changed compared to the predicates, proposed Temporary Abutment and the predicated Temporary Abutment have common in design, function, indications for use, material, manufacturing process, manufacturer, etc.; therefore, the proposed Temporary Abutment is substantially equivalent to the predicated Temporary Abutment (K161689). |   |           |

|            | Multi NP-Cast<br>Cylinder | Esthetic-low<br>Gold Cylinder      | NP-Cast<br>Abutment                  | Remark |
|------------|---------------------------|------------------------------------|--------------------------------------|--------|
| 510(k) No. | Proposed                  | Primary<br>Predicated<br>(K140507) | Reference<br>Predicated<br>(K140507) | -      |



| Manufacturer                     | Osstem Implant Co., Ltd.  | Osstem Implant Co., Ltd.   | Osstem Implant Co., Ltd.   | Identical                   |
|----------------------------------|---|--|--|-----------------------------|
| Design                           |   |  |  | Different<br>but similar    |
| Indications for<br>Use Statement | The Osstem Abutment System is intended for use with a dental implant to provide support for prosthetic restorations such as crowns, bridges, or overdentures.   | Hiossen Prosthetic<br>system is intended for<br>use with a dental<br>implant to provide<br>support for prosthetic<br>restorations such as<br>crowns, bridges, or<br>over-dentures.                             | Hiossen Prosthetic<br>system is intended for<br>use with a dental<br>implant to provide<br>support for prosthetic<br>restorations such as<br>crowns, bridges, or<br>over-dentures. | Identical                   |
| Principle of<br>Operation        | Using making screwretained type prosthesis by casting with non-precious metal alloy; and used with Multi Abutment together by creating framework of the final prosthesis to be fixed on top of the abutment.  | Using making screwretained type prosthesis by casting with gold alloy; and used with Multi Abutment or Esthetic-low Abutment by creating framework of the final prosthesis to be fixed on top of the abutment. | Using screw-retained type prosthesis in cases with path, aesthetic, and spatial constraints by casting with non-precious metal alloy.  | Similar                     |
| Material                         | Body: Co-Cr-Mo Alloy<br>Sleeve: POM   | Body: Gold Alloy<br>Sleeve: POM  | Body: Co-Cr-Mo Alloy<br>Sleeve: POM  | Partial Identical           |
| Casting Material                 | Non-precious<br>metal alloy   | Gold alloy   | Non-precious<br>metal alloy  | Different                   |
| Diameter (mm)                    | 5.0   | 4.8  | 4.0, 4.5   | Bigger than the predicates  |
| Length (mm)                      | 7.3   | 10   | 10   | Smaller than the predicates |
| S.E.                             | Proposed Multi NP-Cast Cylinder has similar design that is composed with body and sleeve together; function; indications for use statement; and is used for making screwretained restoration with Multi Abutment compared to that of the predicated Esthetic-low Gold Cylinder (K140507).  Differences  Proposed Multi NP-Cast Cylinder has bigger diameter than that of the predicated Esthetic- |  |  |                             |



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low Gold Cylinder and NP-Cast Abutment. Also, proposed Multi NP-Cast Cylinder is being casted with non-precious metal alloy as same as the predicated NP-Cast Abutment, but the predicated Esthetic-low Gold Cylinder is being casted with gold alloy. Since the casting material in used for proposed Multi NP-Cast Cylinder has better or substantially equivalent in mechanical strength than that of the predicates; therefore, we do not consider additional fatigue testing.

∴ Proposed Multi NP-Cast Cylinder has similar design that is composed with body and sleeve together; function; and indication for use; compared to that of the predicated Esthetic-low Gold Cylinder (K140507). Therefore, the proposed Multi NP-Cast Cylinder and the predicated Esthetic-low Gold Cylinder is substantially equivalent each other.

|                                  | Multi<br>Combination Cylinder  | Convertible<br>Combination Cylinder  | Remark                             |  |
|----------------------------------|--|--|------------------------------------|--|
| 510(k) No.                       | Proposed   | Predicated (K120847)   | -                                  |  |
| Manufacturer                     | Osstem Implant Co., Ltd.   | Osstem Implant Co., Ltd.   | Identical                          |  |
| Design                           |  |  | Similar                            |  |
| Indications for Use<br>Statement | The Osstem Abutment System is intended for use with a dental implant to provide support for prosthetic restorations such as crowns, bridges, or overdentures.  | The abutment is intended for use with a dental implant to provide support for prosthetic restorations such as crowns, bridges, or overdenture.   | Idenical                           |  |
| Principle of<br>Operation        | Using making combination-<br>retained type prosthesis with<br>using Multi Abutment together<br>by creating framework of the<br>final prosthesis to be fixed on<br>top of the abutment.   | Using making combination-<br>retained type prosthesis with<br>using Convertible Abutment<br>together by creating<br>framework of the final<br>prosthesis to be fixed on tope<br>of the abutment. | Identical                          |  |
| Material                         | Titanium Gr. 3<br>(ASTM F67)   | Titanium Gr. 3<br>(ASTM F67)   | Identical                          |  |
| Diameter (mm)                    | 5.0  | 4.2 ~ 6.3  | Within the range of the predicates |  |
| Length (mm)                      | 7.3  | 7  | Different but similar              |  |
| S.E.                             | Similarities  Proposed Multi Combination Cylinder has similar design, function, and indications for use statement; and is made with same material with same manufacturing method by same manufacturer and is used for making combination-retained restoration with Multi Abutment compared to that of the predicated Convertible Combination Cylinder (K120847). |  |                                    |  |



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### **Differences**

Dimension between the proposed Multi Combination Cylinder and the predicated Convertible Combination Cylinder is different. However, proposed Multi Combination Cylinder has diameter that has within the range of the predicates; and it is a straight type cylinder; so, so we do not consider additional fatigue testing.

∴ Proposed Multi Combination Cylinder has similar design, function, and indication for use; and is casting with same material to make final prosthesis compared to that of the predicated Convertible Combination Cylinder (K120847). Therefore, the proposed Multi Combination Cylinder and the predicated Convertible Combination Cylinder is substantially equivalent each other.

|                                  | Convertible Angled Cylinder   | Convertible Angled Cylinder   | Remark  |
|----------------------------------|---|---|---|
| 510(k) No.                       | Proposed  | Predicated (K063861)  | -   |
| Manufacturer                     | Osstem Implant Co., Ltd.  | Osstem Implant Co., Ltd.  | Identical   |
| Design                           |   |   | Identical except for<br>TiN coating on its<br>surface   |
| Indications for Use<br>Statement | The Osstem Abutment System is intended for use with a dental implant to provide support for prosthetic restorations such as crowns, bridges, or overdentures. | GS System is indicated for use in partially or fully edentulous mandibles and maxillae, in support of single or multipleunit restorations including; cemented retained, screw retained, or overdentrue restorations, and terminal or intermediate abutment support for fixed bridgework. GS System is for one stage surgical procedures. It is not intended for immediate load. | The proposed device and the predicated device has different indication for use in language, however the difference in language does not change the intended use or substantial equivalence status |
| Principle of<br>Operation        | Using making combination-<br>retained type prosthesis by<br>using with Convertible<br>Abutment together when path<br>adjustment is necessary.                 | Using making combination-<br>retained type prosthesis by<br>using with Convertible<br>Abutment together when path<br>adjustment is necessary.   | Identical   |
| Material                         | Titanium Gr. 3<br>(ASTM F67)  | Titanium Gr. 3<br>(ASTM F67)  | Identical   |
| Surface                          | Non-TiN coating   | TiN coating   | Different   |
| Diameter (mm)                    | 4.2, 5.0, 6.3   | 4.2, 5.0, 6.3   | Identical   |
| Length (mm)                      | 7.8   | 7.8   | Identical   |
| Angulation                       | 17°   | 17°   | Identical   |



| Connection | Hex, Non-Hex, Octa  | Hex, Octa  | Identical |  |  |
|------------|---|--|-----------|--|--|
|            | coated), function and indicates same manufacturing method retained restoration with Co  | Similarities  Proposed Convertible Angled Cylinder has same design (except for its surface on TiNcoated), function and indications for use statement; and is made with same material with same manufacturing method by same manufacturer and is used for making combination-retained restoration with Convertible Abutment compared to that of the predicated Convertible Angled Cylinder (K063861). |           |  |  |
| S.E.       | Proposed Convertible Angled Cylinder has no TiN coating on its surface while the predicates have TiN coating on its surface. Also, the proposed Convertible Angled Cylinder Non-Hex type is added. Since this Non-Hex type addition is made having sar dimensions to the predicates; therefore, we do not consider additional fatigue testing.  ∴ While proposed devices has non-TiN coated on its surface, proposed Convertible Angled Cylinder and the predicated Convertible Angled Cylinder have common in design, function, indications for use, material, manufacturing process, manufacturer, etc.; therefore, the proposed Convertible Angled Cylinder is substantially equivalent to the predicated Convertible Angled Cylinder (K063861). |  |           |  |  |

|                                  | Stud Abutment Stud Abutment   |   | Remark    |
|----------------------------------|---|---|-----------|
| 510(k) No.                       | Proposed  | Predicated (K161689)  | -         |
| Manufacturer                     | Osstem Implant Co., Ltd.  | Osstem Implant Co., Ltd.  | Identical |
| Design                           | H   | H   | Identical |
| Indications for Use<br>Statement | The Osstem Abutment System is intended for use with a dental implant to provide support for prosthetic restorations such as crowns, bridges, or overdentures. | The OSSTEM Implant System - Abutment is intended for use with a dental implant to provide support for prosthetic restorations such as crowns, bridges, or overdentures. | Identical |
| Principle of<br>Operation        | Using making stud type overdenture prosthetics  | Using making stud type overdenture prosthetics  | Identical |
| Material                         | Titanium Alloy<br>(Ti-6Al-4V, ASTM F136)  | Titanium Alloy<br>(Ti-6Al-4V, ASTM F136)  | Identical |
| Surface                          | Partial TiN coated in upper   | Partial TiN coated in upper   | Identical |



|                | 1  |  |  |  | 1  |
|----------------|--|--|--|--|--|
|                | <b>D</b> (Ø)   | 3.5  | <b>D</b> (Ø)   | 3.5  |  |
| Dimension (mm) | Body Length  | 6, 6.4,<br>7,7.4,<br>8, 8.4,<br>9, 9.4,<br>10,10.4,<br>11, 11.4  | Body Length  | 6, 6.4,<br>7,7.4,<br>8, 8.4,<br>9, 9.4,<br>10,10.4,<br>11, 11.4  | Addition of abutments having small ball head  ∴ Identical except |
|                | Head<br>Diameter (Ø)   | 1.7  | Head<br>Diameter (Ø)   | 2.25   | for head diameter  |
|                | Head<br>Length (H)   | 2.5  | Head<br>Length (H)   | 3.35   | and head length  |
| S.E.           | and is made with and is used for m predicated Stud A Differences  Proposed Stud A head diameter collength of the propall dimensions are does not received therefore, we do  While propose to that of the pred have common in | butment has sho<br>mpared to that coosed device alle<br>e exactly same. I single load sine<br>not consider added devices has silicated, propose<br>design, functions; therefore, the | with same manufacture retained restorated feeds.  The retained restorated feeds feed | turing method ation compared  If, in the image tud Abutment, roducing overdeposed abutment erdenture so the cing.  and smaller her and the predicate, material, materi | above) and smaller   |

|                                  | O-ring  | O-ring O-ring   |           |
|----------------------------------|---|---|-----------|
| 510(k) No.                       | Proposed  | Predicated (K161689)  | -         |
| Manufacturer                     | Osstem Implant Co., Ltd.  | Osstem Implant Co., Ltd.  | Identical |
| Design                           |   |   | Identical |
| Indications for Use<br>Statement | The Osstem Abutment System is intended for use with a dental implant to provide support for prosthetic restorations such as crowns, bridges, or overdentures. | The OSSTEM Implant System - Abutment is intended for use with a dental implant to provide support for prosthetic restorations such as crowns, bridges, or overdentures. | Identical |



| Principle of<br>Operation | Using inserted into retainer or retainer cap and serves as a buffer for abutments/implants and denture fixation.   | Using inserted into retainer or retainer cap and serves as a buffer for abutments/implants and denture fixation.   | Identical  |
|---------------------------|--|--|--|
| Material                  | NBR (Acrylonitrile &<br>Butadiene Polymer  | NBR (Acrylonitrile & Butadiene Polymer   | Identical  |
| Diameter (mm)             | 3.5  | 4.6  | Different  |
| S.E.                      | made with same material with sa compared to that of the predicate  Differences  Proposed O-ring has smaller dian Stud Abutment that is smaller he  ∴ While proposed device has sn ring and the predicated O-ring has | meter compared to the predicated of ad length (proposed in this submissionaller diameter compared to the prave common in design, function, in manufacturer, etc.; therefore, the | O-ring. It is used with ssion) together. redicated, proposed O-ndications for use, |

|                                  | O-ring Retainer Cap   | niner Cap O-ring Retainer Cap   |           |
|----------------------------------|---|---|-----------|
| 510(k) No.                       | Proposed  | Predicated (K161689)  | -         |
| Manufacturer                     | Osstem Implant Co., Ltd.  | Osstem Implant Co., Ltd.  | Identical |
| Design                           |   |   | Identical |
| Indications for Use<br>Statement | The Osstem Abutment System is intended for use with a dental implant to provide support for prosthetic restorations such as crowns, bridges, or overdentures. | The OSSTEM Implant System - Abutment is intended for use with a dental implant to provide support for prosthetic restorations such as crowns, bridges, or overdentures. | Identical |
| Principle of<br>Operation        | Using inserted and fixed into denture; and is connected with abutment/implants.   | Using inserted and fixed into denture; and is connected with abutment/implants.   | Identical |
| Material                         | Titanium Gr. 3 (ASTM F67)   | Titanium Gr. 3 (ASTM F67)   | Identical |
| Diameter (mm)                    | 3.95  | 5   | Different |
| Height (mm)                      | 2.9   | 3.9   | Different |
| S.E.                             | Similarities  |   |           |



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Proposed O-ring Retainer Cap has same design, function and indications for use statement; and is made with same material with same manufacturing method by same manufacturer compared to that of the predicated O-ring Retainer Cap (K161689).

### **Differences**

Proposed O-ring Retainer Cap has smaller diameter and height compared to the predicated O-ring Retainer Cap. It is used with Stud Abutment that is smaller head length (proposed in this submission) together.

... While proposed device has smaller diameter and length compared to the predicated, proposed O-ring Retainer Cap and the predicated O-ring Retainer Cap have common in design, function, indications for use, material, manufacturing process, manufacturer, etc.; therefore, the proposed O-ring Retainer Cap is substantially equivalent to the predicated O-ring Retainer Cap (K161689).

|                                  | Port Abutment   | LOCATOR RTx  | Remark   |
|----------------------------------|---|--|--|
| 510(k) No.                       | Proposed  | Predicated (K150295)   | -  |
| Manufacturer                     | Osstem Implant Co., Ltd.  | Zest Anchors, Inc.   | Different  |
| Design                           |   |  | Similar  Head part is where connected to overdenture and the screw part is where connected to the implanted fixture.   |
| Indications for Use<br>Statement | The Osstem Abutment System is intended for use with a dental implant to provide support for prosthetic restorations such as crowns, bridges, or overdentures. | The LOCATOR® RTx Implant Attachment System is designed for use with overdentures or partial dentures, retained in whole or in part, by endosseous implants in the mandible or maxilla. | The proposed device and the predicated device has different indication for use in language, however the difference in language does not change the intended use or substantial equivalence status. |
| Principle of<br>Operation        | Using making implant retained overdenture at maxilla/mandible.  | Using making implant retained overdenture at maxilla/mandible.   | Identical  |
| Material                         | Titanium Alloy<br>(Ti-6Al-4V, ASTM F136)  | Titanium Alloy<br>(Ti-6Al-4V ELI)  | Identical  |
| Surface                          | Partial TiN coated in upper   | TiCN or TiN coating  | Within the range of the predicates   |
| Diameter (mm)                    | 3.5 ~ 5.1   | 3.0 ~ 7.0  | Within the range of the predicates   |



| G/H (mm)       | 1 ~ 7  | 1 ~ 6   | Exceed (bigger than) the range of the predicates  |
|----------------|--|---|---|
| Abutment Angle | Straight   | Straight  | Identical   |
| S.E.           | Similarities  Proposed Port Abutment design, same material and is used for ma of the predicated LOCATOR RT  Differences  Dimension between the proposed Abutment has diameter range fror range from 3.0 to 7.0. Also, proposed Port Abutment has TiN RTx has either TiCN or TiN coal intended for straight implantation making overdenture that means a consider additional fatigue testing.   ∴ Proposed Port Abutment has made with same material compa (K150295). Since diameter and opredicated device dimension, no | function, indications for use states aking overdenture retained restorate and the predicates are different: por 3.5 to 5.1 whilte the predicated cosed Port Abutment has G/H rangular range from 1 to 6.  I coating on its surface while the pring on its surface. Proposed abutran, and is not received single load broad is dispersed to the full denture g.  I similar design, function, and indicated to that of the predicated LOCATION of the proposed device are wire additional safety and effectivence ded Port Abutment and the predicate | ment, is made with ion compared to that  proposed Port LOCATOR RTx has e from 1 to 7 while  predicated LOCATOR nent is straight type, is because this is used for e; therefore, we do not extend to attom for use; and is attom for use; and is attom or larger than the ss evaluation is |

|              | Port Angled Abutment &<br>Port Angled Abutment<br>Head | Multi Angled<br>Abutment           | LOCATOR RTx                          | Remark    |
|--------------|--|------------------------------------|--------------------------------------|-----------|
| 510(k) No.   | Proposed   | Primary<br>Predicated<br>(K132067) | Reference<br>Predicated<br>(K150295) | -         |
| Manufacturer | Osstem Implant Co. Ltd.                                |                                    | Zest Anchors,<br>LLC                 | Different |

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| Design                           |   |  |  | Different  |
|----------------------------------|---|--|--|--|
| Indications for<br>Use Statement | The Osstem Abutment<br>System is intended for use<br>with a dental implant to<br>provide support for<br>prosthetic restorations such<br>as crowns, bridges, or<br>overdentures.             | Multi Angled Abutment is intended for use with a dental implant to provide support for prosthetic restorations such as bridges, or overdentures. | The LOCATOR® RTx Implant Attachment System is designed for use with overdentures or partial dentures, retained in whole or in part, by endosseous implants in the mandible or maxilla. | The proposed device and the predicated device has different indication for use in language, however the difference in language does not change the intended use or substantial equivalence status. |
| Principle of<br>Operation        | Using making implant retained overdenture needed of path compensation at maxilla/mandible.  | Using making screw-retained type prosthesis in multiple cases by using with Esthetic-low cylinder when path adjustment is necessary.             | Using for implant retained overdenture at maxilla/mandible.  | Similar  |
| Material                         | Titanium Alloy<br>(Ti-6Al-4V,<br>ASTM F136)   | Titanium Alloy<br>(Ti-6Al-4V,<br>ASTM F136)  | Titanium Alloy<br>(Ti-6Al-4V ELI)  | Identical  |
| Diameter (mm)                    | 4.63 ~ 4.82   | 4.9  | 3.0 ~ 7.0  | Within the range of the predicates   |
| <b>Abutment Angle</b>            | 10°/17°/30°   | 17°/30°  | Straight   | Different  |
| S.E.                             | Similarities  Proposed Port Angled Abutment has similar indications for use statement, design, function, abutment angle, is made with same raw material, and is used for making overdenture |  |  |  |



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retained restoration compared to that of the primary predicate device, Multi Angled Abutment (K132067). Proposed Port Angled Abutment has diameter which is within the range of the reference predicate device, LOCATOR RTx (K150295).

### **Differences**

While proposed Port Angled Abutment has angle of 10, 17, and 30 degrees, the primary predicate device, Multi Angled Abutment has angle of 17 and 30 degrees; but the reference device, LOCATOR RTx is straight type abutment. Proposed Port Angled Abutment should be used connected by Port Angled Abutment Head together to place overdenture on top of the abutment but reference predicate. Since proposed Port Angled Abutment is used to make overdenture and does not receive single load because the load is dispersed to the denture; therefore, we do not consider additional fatigue testing.

∴ Proposed Port Angled Abutment has similar indication for use, design, function, abutment angle, and is made with same raw material compared to that of the primary predicate device, Multi Angled Abutment (K132067); and it has diameter that is within the range of the reference predicate device, LOCATOR RTx (K150295). Therefore, the proposed Port Angled Abutment is substantially equivalent to the predicates.

|                                  | Port Male<br>Port Extended Male   | Retention Insert   | Remark   |
|----------------------------------|---|--|--|
| 510(k) No.                       | Proposed  | Predicated (K150295)   | -  |
| Manufacturer                     | Osstem Implant Co., Ltd.  | Zest Anchors, Inc.   | Different  |
| Design                           |   |  | Similar  |
| Indications for Use<br>Statement | The Osstem Abutment System is intended for use with a dental implant to provide support for prosthetic restorations such as crowns, bridges, or overdentures. | The LOCATOR® RTx Implant Attachment System is designed for use with overdentures or partial dentures, retained in whole or in part, by endosseous implants in the mandible or maxilla. | The proposed device and the predicated device has different indication for use in language, however the difference in language does not change the intended use or substantial equivalence status. |
| Principle of<br>Operation        | Using inserted between Port<br>Abutment/Port Angled<br>Abutment and Port Male Cap<br>and takes a role to maintain<br>retention of overdenture.                | Using inserted between Locator RTx and dental attachment housing and takes a role to maintain retention of overdenture.  | Identical  |
| Material                         | Nylon   | Nylon or PEEK  | Within the range of the predicates   |



|      | Similarities   |
|------|--|
|      | Proposed Port Male/Port Extended Male has similar design, function, indications for use statement, and is made with one of same materials compared to that of the predicated Retention Insert (K150295).   |
|      | Differences  |
| S.E. | Proposed Male has 6 different types based on its retention levels while the predicated Retention Insert has simplified 4 different types based on its retention levels from zero to high.  |
|      | ∴ Proposed Port Male/Port Extended Male has similar design, function, and indication for use; and is made with one of same materials compared to that of the predicated Retention Insert (K150295). Therefore, the proposed Port Male/Port Extended Male and the predicated Retention Insert is substantially equivalent each other. |

|                                  | Port Male Cap   | Denture Attachment<br>Housing  | Remark   |
|----------------------------------|---|--|--|
| 510(k) No.                       | Proposed  | Predicated (K150295)   | -  |
| Manufacturer                     | Osstem Implant Co., Ltd.  | Zest Anchors, Inc.   | Different  |
| Design                           |   | 1 = 1  | Similar  |
| Indications for Use<br>Statement | The Osstem Abutment System is intended for use with a dental implant to provide support for prosthetic restorations such as crowns, bridges, or overdentures.   | The LOCATOR® RTx Implant Attachment System is designed for use with overdentures or partial dentures, retained in whole or in part, by endosseous implants in the mandible or maxilla. | The proposed device and the predicated device has different indication for use in language, however the difference in language does not change the intended use or substantial equivalence status. |
| Principle of<br>Operation        | Using fixing Port Male or Port Extended Male by inserted into the denture.  | Using fixing Retention Insert by inserted into the denture.  | Identical  |
| Material                         | Titanium Alloy<br>(Ti-6Al-4V, ASTM F136)  | Titanium Alloy<br>(Ti-6Al-4 ELI)   | Identical  |
| S.E.                             | Similarities  Proposed Port Male Cap has similar design, function, indications for use statement, and is made of same material compared to that of the predicated Denture Attachment Housing (K150295). |  |  |



### **Differences**

Proposed Port Male Cap is not applied of surface treatment while the predicated Denture Attachment Housing has applied of pink anodizing on its surface.

: Proposed Port Male Cap has similar design, function, and indication for use; and is made with same material compared to that of the predicated Denture Attachment Housing (K150295). Therefore, the proposed Port Male Cap and the predicated Dental Attachment Housing is substantially equivalent each other.

|                                  | EbonyGold Cylinder Screw  | <b>EbonyGold Cylinder Screw</b>  | Remark    |  |
|----------------------------------|---|--|-----------|--|
| 510(k) No.                       | Proposed  | Predicated (K120847)   | -         |  |
| Manufacturer                     | Osstem Implant Co., Ltd.  | Osstem Implant Co., Ltd.   | Identical |  |
| Design                           |   |  | Identical |  |
| Indications for Use<br>Statement | The Osstem Abutment System is intended for use with a dental implant to provide support for prosthetic restorations such as crowns, bridges, or overdentures.   | The abutment is intended for use with a dental implant fixture to provide support for prosthetic restorations such as crowns, bridges, or overdenture. | Identical |  |
| Principle of<br>Operation        | Using to connect a cylinder to the abutment.  | Using to connect a cylinder to the abutment.   | Identical |  |
| Material                         | Titanium Alloy<br>(Ti-6Al-4V, ASTM F136)  | Titanium Alloy<br>(Ti-6Al-4V, ASTM F136)   | Identical |  |
| Diameter (mm)                    | 2.2, 2.5  | 2.2, 2.5   | Identical |  |
| Length (mm)                      | 4.35, 4.9   | 4.15, 4.7  | Different |  |
| S.E.                             | A.35, 4.9    4.15, 4.7   Different   Similarities   Proposed Abutment Screw has same design, function and indications for use statement; and is made with same material with same manufacturing method by same manufacturer compared to that of the predicated Abutment Screw (K120847).    Differences   Proposed Abutment Screw has same diameter, but longer in length compared to the predicated Abutment Screw.   ∴ While proposed device has longer in length compared to the predicated, proposed Abutment Screw and the predicated Abutment Screw have common in design, function, indications for use, material, manufacturing process, manufacturer, etc.; and the difference does not affect to safety and effectiveness of the product. Therefore, the proposed Abutment Screw is substantially equivalent to the prediated Abutment Screw (K120847). |  |           |  |



|                                  | Esthetic-low<br>Temporary<br>Cylinder   | Esthetic-low<br>Temporary<br>Cylinder  | Esthetic-low<br>Temporary<br>Cylinder   | Remark  |
|----------------------------------|---|--|---|---|
| 510(k) No.                       | Proposed  | Predicated (K062030)   | Predicated (K160670)  | -   |
| Manufacturer                     | Osstem Implant<br>Co., Ltd.   | Osstem Implant<br>Co., Ltd.  | Osstem Implant<br>Co., Ltd.   | Identical   |
| Design                           |   |  |   | Shape of post is different  |
| Indications for Use<br>Statement | The Osstem Abutment System is intended for use with a dental implant to provide support for prosthetic restorations such as crowns, bridges, or overdentures. | US system and SSII mini are indicated for use in partially or fully edentulous mandibles and maxillae, in support of single or multipleunit restorations including; cemented retained, screw retained, or overdenture restorations, and terminal or intermediate abutment support for fixed bridgework. US System is for two stage surgical procedures. It is not for one stage surgery or immediate load. The SSII mini is for one and two stage surgical procedures. It is not for immediate load. | The OSSTEM Prosthetic System is intended for use with a dental implant to provide support for prosthetic restoration suc h as crowns, bridges, or over- dentures. | The proposed device and the predicated device has different indication for use in language, however the difference in language does not change the intended use or substantial equivalence status |
| Principle of<br>Operation        | Screw retained restoration; using making temporary prosthesis before loading final prosthesis by connected with Multi Abutment, US Multi Angled               | Screw retained restoration; using making temporary prosthesis before loading final prosthesis by connected with Multi Abutment, US Multi Angled  | Screw retained restoration; using making temporary prosthesis before loading final prosthesis by connected with Multi Abutment, US Multi Angled                   | Identical   |



|                    | Abutment or Esthetic-low Abutment to make overdenture and bridge as multiple cases.   | Abutment or Esthetic-low Abutment to make overdenture and bridge as multiple cases.   | Abutment or<br>Esthetic-low<br>Abutment to make<br>overdenture and<br>bridge as multiple<br>cases.   |  |
|--------------------|---|---|--|--|
| Material           | Titanium Gr. 3<br>(ASTM F67)  | Titanium Gr. 3<br>(ASTM F67)  | Titanium Gr. 3<br>(ASTM F67)   | Identical  |
| Diameter (mm)      | 4.8, 5.5  | 5.3, 6.0  | 4.8, 5.5   | Partial identical  |
| Post Diameter (mm) | 3.7, 4.1  | 3.8, 4.2  | 3.35, 3.8  | Different  |
| Length (mm)        | 12  | 12  | 12   | Identical  |
| Type               | Standard Type   | Standard Type   | Narrow Type  | Partial identical  |
| Connection         | External Hex  | External Hex  | External Hex   | Identical  |
| S.E.               | indications for use stat method by same manu compared to that of the K160670).  Differences  Proposed Esthetic-low length, but different sh Temporary Cylinder (lindication, etc., but big Esthetic-low Cylinder not have smallest diam testing.  While proposed decompared to the predicated Esthetic-low use, material, manufacraise safety and effecti | ement; and is made with facturer and is used for the predicated Esthetic-love predicated Esthetic-love employed property Cylinder is tape of post compared to K062030). However, it is ger post diameter componenter in this submission, which has smaller diameter attending proposed Esthetic with Temporary Cylinder Inturing process, manufacturing process, manufacturing process, manufacturing process, manufacturing process issue. Therefore | as same connection struct h same material with same making screw-retained we Temporary Cylinder (section of the predicated last same shape of post, pared to that of the predicated last same shape of post, pared to that of the predicated device is used temp, we do not consider add er, same length, but differ the common in function currer, etc.; and the differ the proposed Esthetic-liquidated Esthetic-low Temporary Cylinder the proposed Esthetic-liquidated Es | ler diameter, same Esthetic-low diameter, length, icated narrow type porarily and does itional fatigue  erent shape of post ler and the n, indications for prence does not low Temporary |

|              | Temporary Cap            | Temporary Cap            | Remark    |
|--------------|--------------------------|--------------------------|-----------|
| 510(k) No.   | Proposed                 | Predicated (K080594)     | -         |
| Manufacturer | Osstem Implant Co., Ltd. | Osstem Implant Co., Ltd. | Identical |

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| Design                           |  |   | Shape of post is different  |
|----------------------------------|--|---|---|
| Indications for Use<br>Statement | The Osstem Abutment System is intended for use with a dental implant to provide support for prosthetic restorations such as crowns, bridges, or overdentures.  | The MS System (Narrow Ridge) is intended to use in the treatment of missing mandibular central and lateral incisors to support prosthetic device, such as artificial teeth, in order to restore chewing function in partially edentulous patients. MS System (Narrow Ridge) are intended for single use only. | The proposed device and the predicated device has different indication for use in language, however the difference in language does not change the intended use or substantial equivalence status |
| Principle of<br>Operation        | Using making prosthetic restoration temporarily by protecting upper structure while final prosthesis is made.  | Using making prosthetic restoration temporarily by protecting upper structure while final prosthesis is made.   | Identical   |
| Material                         | PC (Poly Carbonate)  | PC (Poly Carbonate)   | Identical   |
| Diameter (mm)                    | 4  | 3.95<br>(4)   | Identical (within its tolerance of $\pm 0.05$ )   |
| Length (mm)                      | 9.6  | 9.6   | Identical   |
| S.E.                             | Proposed Temporary Cap has same basic structure, function, indications for use statement; and is made with same material with same manufacturing method by same manufacturer compared to that of the predicated Temporary Cap (K080594).  Differences  Proposed Temporary Cap has different shape of post compared to the predicated Temporary Cap.  ∴ While proposed device has different shape of post compared to the predicated, proposed Temporary Cap and the predicated Temporary Cap have common in function, indications for use, material, manufacturing process, manufacturer, etc.; and the difference does not raise safety and effectiveness issue. Therefore, the proposed Temporary Cap is substantially equivalent to the predicated Temporary Cap (K080594). |   |   |



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## 7. Summary of Non-clinical Performance Testing

Non-clinical testing data are submitted, referenced, or relied upon to demonstrate substantial equivalence.

## **Biocompatibility Evaluation**

Biocompatibility testing was performed following the FDA Guidance Document *Use of International Standard ISO 10993-1*, "Biological evaluation of medical devices – Part 1: Evaluation and testing within a risk management process" and the ISO 10993 suite of standards.

## Sterilization Validation

Subject devices are provided to the market in non-sterile status, and steam sterilization validation was considered according to ISO 17665-1.

## **Mechanical Properties**

Fatigue testing was considered according to the FDA Guidance Document *Guidance for Industry and FDA Staff Class II Special Controls Guidance Document Root-form Endosseous Dental Implants and Endosseous Dental Abutment* and ISO 14801 standard with the worst case scenario. Retention testing for dental attachments was conducted.

## 8. Summary of Clinical Testing

No clinical studies are submitted.

### 9. Conclusion

In accordance with the Federal Food, Drug and Cosmetic Act, 21 CFR Part 807, and based on the information provided in this premarket notification, OSSTEM IMPLANT Co., Ltd. concludes that Osstem Abutment System is substantially equivalent to the predicates devices as herein.